

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:
All Actions

**DEFENDANT 3M COMPANY'S
MOTION TO REMOVE
"CONFIDENTIAL"
DESIGNATION FROM
DOCUMENTS PRODUCED BY
AUGUSTINE**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and the Protective Order entered in this matter (ECF No. 39, Pretrial Order No. 7), Defendant 3M Company respectfully moves the Court for an order removing the "Confidential" designation on documents produced by Dr. Scott Augustine and his affiliated entities, on the grounds that (1) the documents do not satisfy the requirements of Rule 26(c) or the Protective Order, and (2) their content has already been publicized to a great extent.

3M relies on the accompanying memorandum of law in support of its motion, as well as the Declaration of Monica L. Davies and the exhibits thereto, and all prior proceedings and pleadings heretofore had herein.

Dated: June 5, 2017

Respectfully submitted,

/s/ Monica L. Davies

Jerry W. Blackwell (MN #186867)
Benjamin W. Hulse (MN #0390952)
Monica L. Davies (MN #0315023)
BLACKWELL BURKE P.A.
431 South Seventh Street
Suite 2500
Minneapolis, MN 55415
Phone: (612) 343-3256
Fax: (612) 343-3205
Email: blackwell@blackwellburke.com
bhulse@blackwellburke.com
mdavies@blackwellburke.com

Bridget M. Ahmann (MN #016611x)
FAEGRE BAKER DANIELS LLP
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402
Phone: (612) 766-7000
Email: bridget.ahmann@faegrebd.com

**Counsel for Defendants 3M Company
And Arizant Healthcare, Inc.**